## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ALEXIA PALMER, individually and on behalf of others similarly situated,	) Civil Action No. 14-cv-8307 ) (AT)
Plaintiffs,	) DECLARATION OF LAWRENCE S. ROSEN
v.	) IN SUPPORT OF DEFENDANTS' ) MOTION TO DISMISS
TRUMP MODEL MANAGEMENT, LLC,	)
CORRINE NICOLAS, individually, and	)
JANE OR JOHN DOE, individually,	) )
Defendants.	) ) )

## I, LAWRENCE S. ROSEN, declare as follows:

- 1. I am a partner at LaRocca Hornik Rosen Greenberg & Blaha LLP, attorneys for the defendants Trump Model Management, LLC ("TMM") and Corinne Nicolas (incorrectly s/h/a Corrine Nicolas), and I am personally familiar with the facts and circumstances set forth herein. I submit this declaration in support of defendants' motion, pursuant to Rule 12(b)(6) of the Federal Rules of the Civil Procedure, to dismiss each and every cause of action in plaintiff's Second Amended Complaint.
- 2. Attached as **Exhibit A** is a true and correct copy of plaintiff's Second Amended Complaint.
- 3. Attached as **Exhibit B** is a true and correct copy of defendants' First Request for Admissions, dated January 20, 2015.
- 4. Attached as **Exhibit C** is a true and correct copy of plaintiff's Response to Defendants' First Request for Admissions, dated February 19, 2015.

- 5. Attached as **Exhibit D** is a true and correct copy of the management agreement executed by TMM and plaintiff and dated January 18, 2011 (the "Management Agreement").
- 6. Attached as **Exhibit E** is a true and correct copy of the agreement entitled "Trump Model Management LLC Model's Loan Agreement" executed by plaintiff and dated January 18, 2011 (the "Expense Agreement").
- 7. Attached as **Exhibit F** is a true and correct copy of the written accounting provided to plaintiff, as admitted by plaintiff in her response to the requests for admission.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 3<sup>rd</sup> day of March, 2015, in New York, New York.

Lawrence S. Rosen